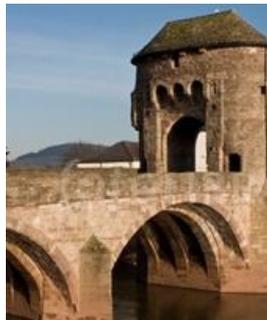




Greater Gwent (Torfaen) Pension Fund

Governance Policy & Compliance Statement 2018/2019

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Greater Gwent (Torfaen) Pension Fund

Governance Policy Statement

April 2018

This Statement has been prepared by Torfaen County Borough Council (the Administering Authority) to set out the governance arrangements for the Greater Gwent (Torfaen) Pension Fund (the Scheme), in accordance with Regulation 55 of the Local Government Pension Scheme Regulations 2013.

1. Introduction

The Local Government Pension Scheme (Amendment) (no.2) Regulations 2005 si 2005 no. 3199 provided the original statutory framework from which the Administering Authority is required to prepare a Fund Governance Statement. The statement was required to cover the following areas of governance:-

- i. Decision making and accountability
- ii. Written Policies.
- iii. Communications
- iv. Risk control

Additionally, Section 73A of the 1997 Local Government Pension Scheme Regulations (as amended) required Local Government Pension Scheme administering authorities to measure their governance arrangements against a number of standards set out within guidance issued by the Department for Communities and Local Government (CLG).

The Local Government Pension Scheme Regulations 2013 (Regulation 55) updated the requirement for this statement to be prepared, including the requirement to publish details of the Local Pension Board established under the 2013 regulations, and in accordance with LGPS (Amendment) (Governance) Regulations 2015 and associated guidance from the National Shadow Scheme Advisory Board. This statement therefore sets out the governance arrangements for the Fund including the role of the Administering Authority; Pensions Committee and Local Pension Board within these.

2. Decision Making and Accountability

o TCBC administrative arrangements

Torfaen County Borough Council is the administering authority for the Greater Gwent (Torfaen) Pension Fund ("the Fund") under the terms of the Local Government Pension Scheme (Local Government Re-organisation in Wales) Regulations 1995. As the statutory administering authority for the Fund, Torfaen is responsible for making sure appropriate arrangements are in place to administer all aspects of the Fund. Torfaen has established a Pensions Committee to discharge the duties of the Council as Administering Authority of the Fund. The Pensions Committee has been established and operates within the Council's constitutional arrangements and, as a Committee of the Council, is subject to the rules of political balance.

In accordance with the Public Service Pensions Act 2013 Torfaen has also established a Local Pension Board to support the Pensions Committee in the discharge of its functions. It comprises employer and member representatives in equal numbers and replaces the Pension Fund Management Group which previously provided the oversight and scrutiny that the Local Pension Board now provides within its statutory role.

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o **Role/terms of reference of the Pensions Committee**

The Council has delegated its functions as administering authority of the Fund to the Pensions Committee which routinely meets on a quarterly basis. The Committee decides on the investment policy most suitable to meet the liabilities within the Fund and has responsibility for the Fund's investment strategy and administrative arrangements.

The membership of the Pensions Committee, together with advisors and dedicated internal officers for the Fund are as follows:-

1. Chair of the Pensions Committee: Councillor Glyn Caron
2. Members of the Pensions Committee:
 - Councillor Huw Bevan
 - Councillor Joanne Gauden
 - Councillor Jon Horlor
 - Councillor Peter Jones
 - Councillor Raymond Williams
3. Administrator: Nigel Aurelius, Assistant Chief Executive Resources
4. External Independent Investment Advisors: Aoifinn Devitt (Deputy Elizabeth Carey CFA)
5. Head of Service: Graeme Russell, Head of Pensions
6. Actuary: Hymans Robertson (Douglas Green)
7. Investment Consultant: Mercer Investment Consulting (Joanne Holden)
8. Solicitor and Legal Advisors to the Fund:
 - Tim James, Chief Legal Officer
 - Delyth Harries, Monitoring Officer and Assistant Chief Legal Officer
9. Investment Managers:
 - BlackRock
 - Fidelity Worldwide Investments
 - Invesco Perpetual
 - Lazard Asset Management
 - Standard Life Investments
10. Custodians: Bank of New York Mellon

The terms of reference of the Pensions Committee include overseeing the following functions:

- i) To ensure proper arrangements are made for the governance, management, benefits and financial administration and investment of the Fund.
- ii) To determine the overall policy objectives and to oversee the formulation and publication of the statutory statements of the Fund in accordance with the best interests of Fund members and in accord with relevant legislation.
- iii) To determine the strategy for the investment of Fund monies including the variety and suitability of investments and to monitor investment performance.
- iv) To ensure appropriate investment management arrangements are in place for the Fund monies and to review investment manager performance.

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- v) To establish and maintain arrangements for the effective management and administration of the Fund, including staffing and budgetary arrangements.
 - vi) In undertaking the above, to consult as appropriate and consider any views expressed by employing organisations and staff representatives.
 - vii) To receive regular training to enable committee members to make effective decisions and be fully aware of their statutory and fiduciary responsibilities and their stewardship role.
 - viii) To establish a scheme of delegation giving officers powers to make decisions on such terms as they consider appropriate within the overall terms of reference of the Pensions Committee.
- o **Role/terms of reference of the Local Pension Board**

The Public Service Pensions Act 2013 set out the requirements for all public sector schemes to introduce Local Pension Boards. In respect of the Local Government Pension Scheme (LGPS) then the LGPS (Amendment) (Governance) Regulations 2015 and associated guidance from the National Shadow Scheme Advisory Board set out the position for the creation and operation of local Boards in England and Wales.

The statutory role of the Local Pension Board as defined within the regulations is to:

- assist the Administering Authority with securing compliance with regulations, other legislation relating to the governance and administration of the Pension fund and the requirements imposed by the Pensions Regulator in relation to the LGPS, and;
- assist the Administering Authority in ensuring the effective and efficient governance and administration of the Scheme.

The Local Pension Board must have an equal number of scheme member representatives and employer representatives. An officer or councillor of the Administering Authority who is responsible for the discharge of any function under the Regulations cannot be a member of the Board. Representatives must have the "capacity" to represent the employers and members (as appropriate) of the fund as well as meeting an ongoing legal requirement in relation to knowledge and understanding of pension matters. The Local Pension Board for the Greater Gwent (Torfaen) Pension Fund was established within the Council's constitution in March 2015. It was subsequently constituted with an independent Chair, 5 employer nominations and 5 employee nominations and, like the Pensions Committee, now meets on a quarterly basis. The Chair was appointed following an advertised recruitment process and, following requests for expressions of interest, the following nominations (5 employer and 5 employee representatives) are currently serving on the Board:

Independent Chair

- Ian Coleman

Employee representatives

- Bob Campbell
- Anthea Wellington
- John Wright
- Jan Davies
- **Vacant**

Employer representatives

- Steve Harford
- Rhian Hayden
- Meirion Rushworth
- Jane Waters
- **Vacant**

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o **Role/terms of reference of TCBC Cross-Cutting Resources and Business Overview and Scrutiny Committee**

The Torfaen Cross-Cutting Resources and Business Overview and Scrutiny Committee has responsibility for:

- Exercising a scrutiny and advisory role by questioning and evaluating the impact of the decisions and actions of the Pensions Committee.
- Reviewing the performance of the Fund.

o **Other roles/terms of reference**

The Investment Manager(s) is responsible for:

- the investment of the Fund's assets in compliance with prevailing legislation, the constraints imposed by the Funds policy documents and the detailed Investment Management Agreement.
- where specified, tactical asset allocation around the strategic benchmark and security selection within asset classes.
- preparation of quarterly reports including a review of investment performance and attending quarterly meetings with officers and also with the Pensions Committee if requested.
- assisting the Pensions Committee in the preparation and review of policy documents.
- voting shares in accordance with the Fund's policy.
- providing details in a timely manner to BNY Mellon the Fund's performance measurer.

The Custodian is responsible for:

- keeping the assets of the Fund safe, settling trades and dealing with corporate actions.
- its own compliance with prevailing legislation.
- providing the Administering Authority with quarterly valuations of the Fund's assets and details of all transactions during the quarter.
- collection of income and tax reclaims.

The Investment Advisor is responsible for:

- assisting the Pensions Committee in the preparation and review of policy documents.
- assisting the Pensions Committee and the internal Investment Officer in their regular monitoring of each Investment Manager's performance, and
- assisting the Pensions Committee in the selection and appointment of Investment Managers and Custodians.

The Actuary/Investment Consultant is responsible for:

- assisting the Pensions Committee in the preparation and review of policy documents.
- providing advice as to the liability profile of the Fund and its funding level in order to aid the Pensions Committee in balancing the short term and long term objectives of the Fund, i.e. preparing the actuarial valuation and setting employer contribution rates.
- providing additional advice as requested and as required from time to time on investment matters.

The Assistant Chief Executive Resources is responsible for:

- advising the Pensions Committee in respect of issues within the scope of this document
- ensuring compliance with this document and bringing breaches thereof to the attention of the Pensions Committee.
- ensuring that this document is regularly reviewed and updated in accordance with the Regulations and other relevant legislation.

- implementing the decisions made by the Pensions Committee.

- o **Reporting arrangements**

All meetings of the Pensions Committee, Local Pension Board or Torfaen Cross-Cutting Resources and Business Overview and Scrutiny Committee are documented and minuted. Any decisions made under The Fund's scheme of delegation outside of formal Pensions Committee meetings are documented, reported to the Pensions Committee Chair and then subject to review by the Pensions Committee in accordance with Torfaen's constitutional arrangements.

As part of the overall approach to communications, regular engagement takes place with employers via meetings and bulletins and pensioners receive a regular newsletter. All current members receive annual benefits statements and access to enhanced information regarding their pensions via the Fund's online "My Pension Online" service. Key documents such as the annual report and accounts are available for viewing in the Governance section of the Fund's website at the following address:- www.gwentpensionfund.co.uk and a summary/synopsis of the financial results is produced each year.

- o **Role of Internal Audit and the Audit Commission in Wales**

The role of internal audit is to provide an independent appraisal function of the internal control system of the Fund. It objectively examines, evaluates and reports on the adequacy of internal control as it relates to the Fund's affairs.

The Local Government Finance regulatory framework requires an external independent auditor to be appointed. The Audit Commission in Wales act in this role and have appointed Grant Thornton to act on their behalf to ensure the Funds accounts are prepared in accordance with proper practice, together with taking a wider view in considering proper arrangements for securing economy, efficiency and effectiveness in the use of resources.

3. **Written Policies**

The Pension Fund publishes a number of important documents designed to inform, engage and communicate key messages to the benefit of all stakeholders. These include:-

- o **Annual Report and Accounts**

This document sets out the financial results of the preceding financial year together with a summary of the investment manager performance and a profile of the Fund and its member and asset composition. The full document is available from the Head of Pensions or on the Fund's website at the following address:-

<https://gwentpensionfund.co.uk/media/2942/annual-report.pdf>

- o **Funding Strategy Statement**

The requirement for Local Government Pension Funds to produce a Funding Strategy Statement was introduced by the Local Government Pension Scheme (Amendment) Regulations 2004. Under the regulations, the administering Authority must prepare, maintain and publish a written statement setting out their Funding Strategy. The Statement sets out to establish a clear and transparent strategy, specific to the Fund, which will identify how employers pension liabilities are best met going forward. Further details are contained in the full Funding Strategy Statement available from the Head of Pensions or from the Fund's website at the following address:-

<https://gwentpensionfund.co.uk/media/2675/funding-strategy-statement-march-2017.pdf>

o Investment Strategy Statement

The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2016 came into effect on 1st November 2016 and included a specific requirement under Section 7 of the Regulations to produce an Investment Strategy Statement (ISS) (to replace the Fund's Statement of Investment Principles) by 1st April 2017.

The formulation of this new statement was a significant requirement for the Fund requiring consideration of current investment policy right across the investment areas in scope of the new regulations and statutory guidance. The document sets out the investment strategy of the Fund, based on its current policies with the aim of providing transparency in relation to the Fund's investment objectives and how these are implemented, managed and monitored. This Statement will be reviewed by the Committee at least triennially or more frequently should any significant change occur. Further details are contained in the full Investment Strategy Statement available from the Head of Pensions or from the Fund's website at the following address:-

<https://gwentpensionfund.co.uk/media/2676/investment-strategy-statement-2017-2018.pdf>

o Service Improvement Plan

This document acts as a work plan for the officers of the Fund. It sets out objectives, timescales and key performance indicators for the administration, investment and governance aspects of the Fund. Further details are available from the Head of Pensions.

o Actuarial Valuation

Current LGPS Regulations stipulate that a valuation of assets and liabilities of the Fund must be undertaken every 3 years in order to form a view as to the Fund's notional solvency level and to be able to adjust employer contribution rates as required. Extracts of the most recent Actuarial Valuation report are included in the Annual Report and the full report is available from the Head of Pensions or from the Fund's website at the following address:-

<https://gwentpensionfund.co.uk/media/2674/valuation-report.pdf>

4. Communications

The Fund aims to provide excellent high quality services to all our service users in a timely and accurate manner. An effective approach to Communications therefore lies at the heart of this and is essential if we are to provide consistent standards of service to all.

To further these aims, the most recent review and updating of the Fund's Communications Policy Statement reflects a continued significant focus on the Fund's approach to publicity and communications across all stakeholder groups and, within that, the development of a wider suite of engagement mechanisms. Further details are available from the Head of Pensions or from the Fund's website at:-

<http://www.gwentpensionfund.co.uk/media/3585/communications-policy-2018.pdf>

5. Risk Control

Risk is inherent in many of the Funds activities, particularly as they relate to investments but the Pensions Committee recognises the need to reduce risk to a minimum where it is possible to do so without compromising investment returns and to limit risk to acceptable levels. This is achieved through a number of actions:-

1. Two layers of Scrutiny and overview by Committee together with reporting.
2. Clear accountability and reporting lines.

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3. By the appointment of a number of regulated external third party investment managers appointed directly by the Council with control and risk issues addressed in an investment management agreement.
4. By the appointment of a regulated external third party custodian appointed directly by the Council with control and liability issues addressed in a custody agreement.
5. Documenting control and liability issues relating to relationships with the appointed external fund managers in fund manager agreements.
6. By officers of the Fund's Investment Team and Accountancy Section of Torfaen County Borough Council independently maintaining complete accounting records relating to the investment activity of the appointed external fund managers and to the income and dividend flows arising from the fund security portfolios.
7. By officers of the Council's Internal Audit section reviewing the internal procedures maintained within Torfaen across all Fund related areas including governance, payroll, administrative and investments.
8. By the incorporation of identified risks within a Pension Fund specific Risk Register including assessments of likelihood, impact and measures in place to monitor and control these. The Register is subject to regular review by Fund Officers; Pensions Committee and the Local Pension Board

In an investment sense, risk is also controlled by:-

- * Diversifying the portfolio by the number of investment managers and across different types of investment.
- * Restricting external appointed fund manager investment activity in accordance with LGPS Regulations and as documented in fund management agreements.
- * By selecting appropriate investment benchmarks and variance parameters to control the risk.
- * By taking appropriate internal and external professional advice.
- * Via meetings of the Pensions Committee and the Pension Fund Management Group.

6. Review

This Statement will be subject to regular review for any material change that could affect the policy, and then with appropriate consultation. Feedback is also welcomed on this Governance Policy and Compliance Statement and should be sent to the Council for the attention of the Head of Pensions, Civic Centre, Pontypool, Torfaen NP4 6YB or by email to graeme.russell@torfaen.gov.uk.

Resources Directorate
Torfaen County Borough Council
April 2018

Greater Gwent (Torfaen) Pension Fund

Governance Compliance Statement

Section 73A of the 1997 Local Government Pension Scheme Regulations (as amended) require Local Government Pension Scheme administering authorities to measure their governance arrangements against a number of standards set out within guidance issued by the Department for Communities and Local Government (CLG). Where compliance does not meet the published standard, there is a requirement, under Regulation 73A(1)(c) of the 1997 Regulations, to provide the reasons for not complying. With effect from 1 April 2008, this responsibility to review and, where necessary, revise "Governance Compliance Statements" published under Regulation 73A of the 1997 Regulations, is set out in Regulation 31 of the 2008 Regulations, with reasons for non compliance required under Regulation 31(3) (c).

In accordance with the CLG guidance, the Governance Compliance Statement comprises analysis of the Fund's governance arrangements against 9 Principles, rating the Fund's compliance against each element of these principles.

In accordance with this requirement the Governance Compliance Statement of the Greater Gwent (Torfaen) Pension Fund follows on pages 113 to 120 below.

Within the Statement a "traffic light" system has been used to clearly demonstrate the level of compliance with the 9 Principles of good governance practice:-

- =  Full compliance (with any comments noted in the "Comments" Box below).
- =  Partial compliance (for reasons noted in the "Reasons" Box below).
- =  Non-compliance (for reasons noted in the "Reasons" Box below).

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Principle A - Structure

- a) The management of the administration of benefits and strategic management of fund assets clearly rests with the main committee established by the appointing council.
- b) That representatives of participating LGPS employers, admitted bodies and scheme members (including pensioner and deferred members) are members of either the main or secondary committee established to underpin the work of the main committee.
- c) That where a secondary committee or panel has been established, the structure ensures effective communication across both levels.
- d) That where a secondary committee or panel has been established, at least one seat on the main committee is allocated for a member from the secondary committee or panel.

| | Not Compliant | | | | Fully Compliant |
|----|---------------|--|--|--|---|
| a) | | | | |  |
| b) | | | | |  |
| c) | | | | |  |
| d) | | | | |  |

Reason for non-compliance (regulation 73A(1)(c)/1997 Regulations) /Regulation 31(3)(c)/2008 Regulations).

Comments on the ratings given above :

- a) The management of the Fund clearly rests with the main Pensions Committee that has formally been in place within the Council's constitutional arrangements since March 2009.
- b, c & d) In accordance with the 2013 Public Services Pensions Act the Fund has formed a Local Pension Board. This has superseded the previous stakeholder representative group, the Pension Fund Management Group. The Local Pension Board has been established in accordance with the Act's statutory requirements and the Board's Terms of Reference are clear with regard to both its membership and its core functions, including how, in carrying out these functions, it links and communicates effectively right across the Fund's governance arrangements. In addition, to compensate for the reduced physical membership numbers that the change to the statutory requirements of the Local Pension Board has naturally led to, the Pension Fund is now ensuring that it engages more frequently with employers and wider stakeholders via a wider suite of engagement mechanisms developed within the context of a revised Communications Policy Statement published during 2017.

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Principle B - Representation

a) That all key stakeholders are afforded the opportunity to be represented within the main or secondary committee structure. These include :-

- i) employing authorities (including non-scheme employers, e.g. admitted bodies);
- ii) scheme members (including deferred and pensioner scheme members),
- iii) where appropriate independent professional observers, and
- iv) expert advisors (on an ad-hoc basis).

b) That where lay members sit on a main or secondary committee, they are treated equally in terms of access to papers and meetings, training and are given full opportunity to contribute to the decision making process, with or without voting rights.

| | Not Compliant | | | | Fully Compliant |
|----|---------------|--|--|--|---|
| a) | | | | |  |
| b) | | | | |  |

Reason for non-compliance (regulation 73A(1)(c)/1997 Regulations) /Regulation 31(3)(c)/2008 Regulations).

Comments on the ratings given above :

a) Representation on the Fund's main Pensions Committee is in accordance with the Council's constitutional arrangements. Representation on the secondary Local Pension Board is in accordance with the statutory requirements of the Public Services Pensions Act 2013. The Fund does not utilise an independent professional observer within its governance arrangements as it is content that adequate scrutiny is applied specifically via stakeholder representation on the Local Pension Board and more generally via the council's constitutional arrangements.

b) Meetings of the Pensions Committee and the Local Pension Board are public meetings and as such all members of the public, including Fund stakeholders, have access to both meetings and relevant papers. Both Pensions Committee and Local Pension Board routinely consider their knowledge and skills requirements and that appropriate training plans are in place. Both bodies receive a log of training and education activity at each meeting and, in conjunction with Fund officers, are continuing to develop a training and education programme, which takes appropriate account of new member training needs and the CLG approved CIPFA Knowledge and Skills Framework.

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Principle C – Selection and role of new members

- a) That committee or panel members are made fully aware of the status, role and function they are required to perform on either a main or secondary committee.
- b) That at the start of any meeting, committee members are invited to declare any financial or pecuniary interest related to specific matters on the agenda.

| | Not Compliant | | | | Fully Compliant |
|----|---------------|--|--|--|---|
| a) | | | | |  |
| b) | | | | |  |

Reason for non-compliance (regulation 73A(1)(c)/1997 Regulations) /Regulation 31(3)(c)/2008 Regulations).

Comments on the ratings given above :

Both the Pensions Committee and Local Pension Board were established and operate within the Council's constitution with clear terms of reference and provision for the declaration of interests at the start of each meeting.

Principle D – Voting

- a) The policy of individual administering authorities on voting rights is clear and transparent, including the justification for not extending voting rights to each body or group represented on main LGPS committees.

| | Not Compliant | | | | Fully Compliant |
|----|---------------|--|--|--|---|
| a) | | | | |  |

Reason for non-compliance (regulation 73A(1)(c)/1997 Regulations) /Regulation 31(3)(c)/2008 Regulations).

Comments on the ratings given above :

The Fund's Pensions Committee has a clear voting policy that is fully in accordance with the Council's constitution. The Local Pension Board is not a decision making body but does provide oversight and scrutiny of the management of the Pension Fund and Pensions Committee decisions. It has been constituted in accordance with the requirements of the Public Service Pensions Act 2013. Its Terms of Reference provide details of the operation of the Local Pension Board including a clear policy on its meetings, quorum and voting rights.

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Principle E - Training / Facility time / Expenses Structure

a) That in relation to the way in which statutory and related decisions are taken by the administering authority, there is a clear policy on training, facility time and reimbursement of expenses in respect of members involved in the decision-making process.

b) That where such a policy exists, it applies equally to all members of committees, sub-committees, advisory panels or any other form of secondary forum.

c) That the administering authority considers the adoption of annual training plans for committee members and maintains a log of all such training undertaken.

| | Not Compliant | | | | Fully Compliant |
|----|---------------|--|--|--|---|
| a) | | | | |  |
| b) | | | | |  |
| c) | | | | |  |

Reason for non-compliance (regulation 73A(1)(c)/1997 Regulations) /Regulation 31(3)(c)/2008 Regulations).

Comments on the ratings given above :

a) The Fund's Pensions Committee was established and operates within the council's constitution with an established policy in terms of elected member expenses and access to corporate training. Members of the Pensions Committee are also undertaking a programme of training commensurate with the knowledge and skills required to consider Pension Fund matters and make informed decisions in respect of these matters. A log of training undertaken is reported back as a standing item to each Committee meeting with an opportunity for members to share training experiences and consider future requirements with fellow Committee members.

b) The Local Pension Board was established in accordance with the Public Service Pension Act 2013 which includes a statutory requirement for Board members to have an appropriate degree of knowledge and understanding to enable the proper exercise of their role. The approach taken to facilitate this is similar to that operated by the Pensions Committee with an appropriate programme of training being developed and training undertaken reported back to each meeting for consideration by Local Pension Board members and identification of future training needs.

c) A log of Committee and Local Pension Board member training undertaken is reported back as a standing item to each meeting with an opportunity for members to share training experiences and discuss future training requirements with fellow Committee/Board members.

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Principle F - Meetings (frequency/quorum)

- a) That an administering authority's main committee or committees meet at least quarterly.
- b) That an administering authority's secondary committee or panel meet at least twice a year and is synchronised with the dates when the main committee sits.
- c) That an administering authority who does not include lay members in their formal governance arrangements, provide a forum outside of those arrangements by which the interests of key stakeholders can be represented

| | Not Compliant | | | | Fully Compliant |
|----|---------------|--|--|--|---|
| a) | | | | |  |
| b) | | | | |  |
| c) | | | | |  |

Reason for non-compliance (regulation 73A(1)(c)/1997 Regulations) /Regulation 31(3)(c)/2008 Regulations).

Comments on the ratings given above :

a & b) Both the Pensions Committee and Local Pension Board meet quarterly with meetings co-ordinated to allow appropriate consideration of the respective agendas and minutes of each body.

c) The Local Pension Board has been established within the requirements of the Public Services Pensions Act and therefore ensures that there is appropriate stakeholder representation in accordance with these statutory requirements. In addition, to compensate for the reduced physical membership numbers that the change to the statutory requirements of the Board has naturally led to, the Pension Fund is now ensuring that it engages more frequently with employers and wider stakeholders via a wider suite of engagement mechanisms developed within the context of a revised Communications Policy Statement published during 2017.

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Principle G - Access

a) That subject to any rules in the council's constitution, all members of main and secondary committees or panels have equal access to committee papers, documents and advice that falls to be considered at meetings of the main committee.

| | Not Compliant | | | | Fully Compliant |
|----|---------------|--|--|--|---|
| a) | | | | |  |

Reason for non-compliance (regulation 73A(1)(c)/1997 Regulations) /Regulation 31(3)(c)/2008 Regulations).

Comments on the ratings given above :

Meetings of both the Pensions Committee and Local Pension Board are public meetings and as such all members of the public, including Fund stakeholders, have access to relevant papers, documentation and council officers for relevant background information.

Principle H - Scope

a) That administering authorities have taken steps to bring wider scheme issues within the scope of their governance arrangements.

| | Not Compliant | | | | Fully Compliant |
|----|---------------|--|--|--|---|
| a) | | | | |  |

Reason for non-compliance (regulation 73A(1)(c)/1997 Regulations) /Regulation 31(3)(c)/2008 Regulations).

Comments on the ratings given above :

Both the Pensions Committee and Local Pension Board consider matters that cover the full range of Pension Fund issues including governance, investments, benefits and administration.

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Principle I - Publicity

a) That administering authorities have published details of their governance arrangements in such a way that stakeholders with an interest in the way in which the scheme is governed, can express an interest in wanting to be part of those arrangements.

| | Not Compliant | | | | Fully Compliant |
|----|---------------|--|--|--|---|
| a) | | | | |  |

Reason for non-compliance (regulation 73A(1)(c)/1997 Regulations) /Regulation 31(3)(c)/2008 Regulations).

Comments on the ratings given above :

The Fund's governance arrangements and key member / officer contacts are published within this "Governance Policy & Compliance Statement"; the Fund's "Annual Report" and other documentation widely available on the Fund's and Council's website. This Governance Policy & Compliance Statement also contains details of the membership of the Local Pension Board. The Board was formed following invitations sent to Fund stakeholders and a subsequent expression of interest and appointment process. Additionally meetings of the Pensions Committee and Local Pension Board are public meetings so anyone interested in the Pension Fund governance arrangements may observe these meetings and have opportunity to view meeting papers in advance via the Council's website. The Fund's own website, combined with regular newsletter communications to the various stakeholder groups, already provides an extensive publicity and communication mechanism for the Pension Fund. Development of the Fund's website is continuing and recent initiatives within this, such as "My Pension Online", provide even greater interactivity between the Fund and its stakeholders building on a wider suite of engagement mechanisms developed within the context of a revised Communications Policy Statement published during 2017.